

## 2nd 80s Fire Tank Deconstruction Objective

Submitted May 1, 2019, **Review of May 7 revision**

### General

- The plan indicates it is an outline of what will occur. There are few specific details to critique. It contains assurances as to safety and environmental procedures. The actual specifics of the steps and associated materials in the plan must be provided for review. – **Not yet addressed.**
- Define/expand/identify all acronyms on first use.
  - Please identify CIWA, 19ITCBD, CWA, 19VPP, 19CS, TWIC DP-09-S-a1, LOTO, IFR and any other terms or designations. – **Not yet addressed.**
- Revise to include discussion on qualifications, experience, required training and certifications for all personnel. – **Not yet addressed.**
- ITC needs to provide detailed, step-by-step procedures to ensure environmentally compliant and safe demolition. – **Not yet addressed.**
- At all times, the contractors and facility will have to make sure the activities are compliant with waste and safety regulations. Detailed procedures to prevent releases or tracking waste out of the demolition area on trucks and equipment are needed. – **Not yet addressed.**
- The decontamination plans for scrap and equipment will need to be filed and approved. – **Not yet addressed.**
- Due to concerns that damage occurred that could have allowed liquid toluene to be released from the tank system, would it be possible to conduct integrity testing of the tank system for Tank 80-13? **Not yet addressed.**

### Start Date

- The plan currently lists Friday May 3<sup>rd</sup>. Please update to the correct expected start date or specify a start date x-days from plan approval. – **updated to Thursday May 9**

### Preparation

- Specifically reference all applicable regulations and ensure copies of them are accessible for review as needed during the entire process. – **Not yet addressed.**
- ITC states they will remove a section of wall for access and put in a temporary small berm (instead of prior plans to build a ramp over the wall). – **revised to delete reference to removing section of wall for building the ramp. Will the wall now be left in place, and the ramp constructed over it? Seems unlikely.** Provide relevant engineering plans and calculations to show that plans will support ingress/egress of heavy equipment. Discuss prevention of accidents, and safety for the moving of heavy equipment through a relatively confined area. – **Not yet addressed.**
- Provide estimate of equipment required, personnel, and safety measures required. – **Not yet addressed.**
- Provide equipment lists and issuance in the plan or identify how ITC will make them accessible through some other means. – **Not yet addressed.**
- Revise to specify acceptance criteria for the facilities receiving generated scrap metal. – **Not yet addressed.**
- Add discussion to clarify that all cleanings of metal parts and the spent and collected cleaning solutions will need characterization and proper disposal. Reference waste

management plan or provide similar information relevant to this activity in this plan. - **Not yet addressed.**

- Clarify the movement, decontamination and logistics of the metal scrap removal from the tank area with set procedures and requirements. Include discussion on any necessary confirmatory sampling to verify waste and scrap metal meets acceptance criteria of the receiving facility. - **Not yet addressed.**

#### Deconstruction Process

- Revise the plan to include stepwise procedures and processes in the deconstruction, addressing (at a minimum) the following:
  - Specify how long the Preparation will take before work on the tank deconstruction itself begins. - **Not yet addressed.**
  - Clarify whether there will be additional preparation steps as demolition moves from one tank to the next. - **Addressed, by stating procedure will be unchanged from tank to tank.**
  - Provide engineering details and any necessary calculations for the East Wall modification and berm. - **Not yet addressed.**
  - Clarify the access and egress discussion within the plan.- **Ok...now there's a berm, with a ramp built over it. Unclear whether leaving wall in place or removing it.**
  - Include a full description of the fire suppression system in the plan. - **Not yet addressed - a few details provided, but hints that there's more.**
  - List current and any additional fire suppression equipment. - **addressed**
  - Indicate how the foaming crews will be deployed to ensure coverage and safety; - **addressed, by giving general location of two foam cannons.**
  - Emphasize that any foam used will need to be non-PFOA/PFAS - **addressed** and provide details on supply of foam and logistics to maintain foam blanket. - **Not yet addressed.**
  - Specify the locations of additional air monitoring resources and have them reviewed by Region 12 Air Section for effectiveness, especially those located off-site from ITC. - **Not yet addressed.**
- Clarify whether foam blanketing will continue while “remaining material from the tank including any liquids or solids” are removed. - **Not yet addressed.**
  - Is this cleaning and remaining material removal step to be done for each tank before moving to the next, or as a separate phase after all tanks have completed the “sufficient” metal removal step? - **Not yet addressed.**
  - Include discussion on how scrap metal will be sampled, and for what parameters, to verify decontamination prior to shipping to a recycle yard. - **Not yet addressed.**
- Specify how the waste water, foam and metal will be characterized. Follow the TCEQ RCRA QAPP. Discuss plans for treatment and final disposal/disposition of all generated materials. - **Not yet addressed.**
- Discuss the containment/on-site management of any collected water/foam and removed metal. - **addressed, lacks detail.**
- Provide transit path for equipment and waste. Clearly identify any overhead hazards that need to be avoided. Need every safety factor identified and included in the plan. - **Not yet addressed.**

- Provide a description of how equipment will be decontaminated at the completion of the five tanks demolition. Include any necessary diagrams to show location and set-up of decontamination area. - **Not yet addressed.**
- Specify that all of the foam and water pooled from the fire/spark suppression will be collected and characterized. Provide a description of the containment and collection measures planned and provide determination criteria for deciding if it needs to be sent to a TDS facility or can be discharged through ITC wastewater treatment facility. - **Not yet addressed.**

#### Sequence

- No comment.

#### Protection of Tank 80-8

- No comment.

#### Schedule

- Provide an estimate of time and schedule, as well as supporting information on the basis for the estimate, for the Deconstruction of Tanks 80-15, 80-14, 80-13, 80-10, and 80-7. - **Supporting info not provided.**
- Break down the schedule to include time allotted for major steps. - **addressed for actual tank demolition, but not mob, prep, demob, site restoration**

#### Notifications

- Revise to a 48-hour notification of the expected shift to the next tank, with a confirmatory 24-hour prior notice. - **Not yet addressed.**
- Include that agencies will be notified if benzene readings elevate during removal process. - **revised to "All agencies".**

#### Safety and Air Emissions

- Once level of PPE and work/rest ratios are determined, document them in the plan, or provide a cross reference to the relevant health and safety plan. - **Not yet addressed.**
- Clarify what permit is referenced regarding PPE and work/rest ratios. - **Not yet addressed.**
- Clarify whether bunker gear will provide enough protection from toxic constituents present in the tanks. - **Not yet addressed.**
- Document states that foam will be applied to minimize air emissions during this operation as needed. Please clarify what criteria defines the need.- **Not yet addressed.** Will it be performed anytime cutting, crunching, moving, etc., the material that came into contact with the waste? Will it be performed only when a specific reading on air monitoring equipment calls for it? What reading would be used? Where would the equipment be located? - **Addressed.** Where would the air sampling equipment be located? - **Not yet addressed.** Up and Down wind? Moving as wind changes? Please identify on maps. - **Not yet addressed.**
- Specify emission control action levels and what actions will be taken; or reference the applicable plan that contains this information. Identify the action levels and exactly what actions will occur. Provide specifics for review. - **Action level provided, action associated with it, is notification only.**
- Include a reference to the Air Monitoring Plan, which was recently reviewed, and which addresses this activity. - **Not yet addressed.**

- Specify Personnel shift length. – **addressed**. The EPA mentioned non-stop work to ensure emissions were controlled. How will this be addressed?
- Provide the Health and Safety plan, or a reference to it. – **Not yet addressed.**
- Identify any anticipated stop work conditions. – **Not yet addressed.**

#### Equipment Staging

- First sentence references equipment operator qualifications and certs. Please specify. Include any necessary OSHA HAZWOPER certifications. – **Not yet addressed.**

#### Diagram of the Tank Deconstruction Objective

- The diagram of the tanks has notes that are unclear or illegible. Revise to clarify these. Also, recommend enlarging the drawing and adding notation of the intended movements. – **Not yet addressed. Revised plan did not include diagram.**
- Revise to include a key for base map elements. – **Not yet addressed.**

#### Note

- No comment.